

GEORGIA AGRICULTURAL COMMODITY COMMISSION FOR PEANUTS

USDA
OAL/KOHC
2005 JUL -6 PM 3: 52

RECEIVED

July 5, 2005

110 E. Fourth St.
P.O. Box 967
Tifton, Georgia 31793
Phone 229-386-3470
FAX 229-386-3501
info@gapeanuts.com
www.gapeanuts.com

Docket Clerk
Marketing Order Administrative Branch
Fruit and Vegetable Programs, AMS, USDA
1400 Independence Ave., SW
STOP 0237
Washington, DC 20250-0237
moab.docketclerk@usda.gov

DIRECTORS

ARMOND MORRIS
Chairman
Irwinville, Georgia

JOE BODDIFORD
Vice Chairman
Sylvania, Georgia

RODNEY DAWSON
Treasurer
Hawkinsville, Georgia

DONALD CHASE
Oglethorpe, Georgia

JIMMY CHENEY
Edison, Georgia

RE: Docket Number FV05-996-2PR, June 21, 2005, Vol. 70, No. 118

Change in Minimum Quality and Handling Standards for Domestic and Imported Peanuts Marketed in the United States

Dear Deputy Administrator:

The Georgia Agricultural Commodity Commission for Peanuts is a Commission of the State of Georgia charged with representing Georgia's more than 5000 peanut growers in the areas of promotion, research, education, and providing information to governmental officials on issues which impact the production and marketing of peanuts. Our producers grow nearly half of the peanuts produced in the US.

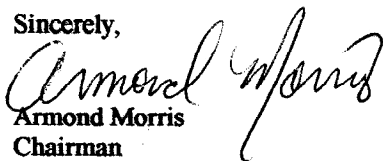
We appreciate the opportunity to provide comment on the U.S. Department of Agriculture's Proposed Rule for "high moisture" grading of farmers stock peanuts.

We believe that anything that can be done to improve efficiency in our industry merits discussion and consideration. We want to be certain that the growers interests are protected and that any proposed changes will not be detrimental to the grower, whether through increased cost or related factors which ultimately translate in to increased cost or lost revenue.

Much research work has been done on green weight grading and in theory it appears to be feasible. In practice we have no information so we urge caution and flexibility as USDA moves forward with this proposal. We hope that growers will share equally with other sectors the benefits if this proposal is successful. Also, changes in the loan program will be mandated, once the peanuts are unloaded from the wagon since there is no preservation of identity. A farmer must be allowed a loan on green peanuts. This loan calculation should be comparable to the current loan on peanuts that have been dried to a suitable loan level.

We trust that the Department will take special care to assure that the producer does not suffer loss in the implementation of "high moisture" grading. We appreciate the apparent willingness of USDA to work with the industry in making this change and hope that you will feel free to contact us as you move forward with this initiative.

Sincerely,


Armond Morris
Chairman
Georgia Peanut Commission

Member



Peanut Advisory Board

DON KOEHLER
Executive Director